

EXHIBIT 6

Proposed Agenda for January 29, 2016 Case Management Conference

- I. Proposed Schedule for Phase II Discovery
 - A. Proposed Track 1 (13 Cases Nearing Trial-Readiness)
 - B. Proposed Track 2 (Other Cases in MDL)
 - C. Submission of Bellwether Proposal (by March 1, 2016)
- II. Scope of Phase II Discovery/Phase I Follow-up – Proposed Track 1 Cases
 - A. FDA Warning Letter and Reporting Issues
 - B. Kay Fuller Allegations
- III. Scope of Phase II Discovery – Proposed Track 2 Cases
 - A. Limitations on Depositions – Binding Effect of Prior Depositions
 - B. Scope of Discovery as to Particular Issues:
 - 1. Simon Nitinol Filter
 - 2. Recovery Cone
 - 3. Sales and Marketing
- IV. ESI and Document Discovery/Issues
 - A. Plaintiffs’ Request for Prior Production Information and “Updating” Productions
 - B. Supplemental Review and Productions
 - 1. Later Generation Devices
 - C. ESI Preservation
- V. Privilege Log Issues
 - A. Process for Resolution of Privilege Disputes
 - B. Whether There Should Be a Special Master